



CITY OF
TUCSON

ENVIRONMENTAL &
GENERAL SERVICES
DEPARTMENT

November 14, 2017

VIA GRANTS.GOV

Noemi Emeric-Ford
Environmental Protection Agency, Region 9
75 Hawthorne Street, SFD6-1
San Francisco, California 94105

**Re: FY2018 Brownfields Community-wide Assessment Grant Application,
Hazardous Substances and Petroleum Products**

Dear Ms. Emeric-Ford:

Attached please find the City of Tucson, Environmental & General Services Department's (City) proposal for an Environmental Protection Agency Brownfields Community-wide Assessment Grant. The City is requesting \$180,000 for Hazardous Substances, and \$120,000 for Petroleum Products Assessments. Our target area is a 2.5-mile corridor along 12th Avenue comprised of portions of eight Census Tracts in southern Tucson, Arizona colloquially known as *La Doce*. The second largest city in Arizona, Tucson has a population of about 528,374, and is located in the Sonoran Desert, about 70 miles north of the border with Mexico. *La Doce* is a significant contributor to Tucson's cultural landscape, with homes and retail shops owned and catering to generations of Mexican-American and native families. The area is a distinctive cultural and business hub with an over 90% Hispanic population serving the needs of the community at affordable prices. *La Doce* was a primary reason Tucson was designated a UNESCO City of Gastronomy, the first such US designation.

La Doce lies south of Interstate 10, between Interstate 19 and Nogales Highway in a relatively isolated pocket of southern Tucson. This cultural enclave has a deep-rooted distrust of local government, partly because residents were displaced from the historical *Barrio Viejo* when it was razed in the 1960s, and others suffered potential long-term exposure to industrial solvent-impacted drinking water from a Superfund source. This project will address environmental justice concerns and we will work with community organizations to provide outreach, health monitoring, and site inventory. Brownfields activities will be prioritized based on community involvement and input, assuring the needs of the community are met. The Brownfields grant will directly advance and incorporate sustainable and equitable development outcomes.

Zoning regulations were not established by Pima County until 1949 and *La Doce* was not annexed until 1960. Consequently, growth occurred in areas like *La Doce* with limited regulatory oversight and without adequate infrastructure and services. In the 1970s, residences began to transition to commercial uses, and many structures now either require significant renovation or have been abandoned. These Brownfields are sometimes blighted and may have real or perceived environmental concerns, which dissuades private redevelopment and public infrastructure investment. We expect our inventory task to identify at least 60 Brownfields within the project area.



P.O. Box 27210 • TUCSON, AZ 85726-7210
(520) 791-3175 • FAX (520) 791-3190
www.tucsonaz.gov

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La Doce has the second most heavily-used bus route; has two major bus lines to Mexico; and is heavily used by motorists, bicyclists, and pedestrians. Despite its heavy use and significance, 12th Avenue is severely lacking public investment. Sidewalks exist in short stretches, and lack of defined walking spaces between schools, bus stops, and businesses is dangerous for non-motorists. Poor infrastructure contributes to an impression the area is run down and blighted. Our project will improve walkability, regional identity, and aesthetics in this district. The project will spur commercial investment; reduce air pollution and blight; increase tourism; and improve safety for pedestrians, bicyclists, transit users, and motorists who use 12th Avenue.

a. Applicant Identification

City of Tucson
PO Box 27210
Tucson, Arizona 85726-7210

b. Funding Requested:

- i. Grant type: Assessment
- ii. Grant Type: Community-Wide
- iii. Funds Requested: \$120,000 (Petroleum)
\$180,000 (Hazardous)
- iv. Contaminant: Both – Petroleum
Products and Hazardous Substances

c. Location:

Tucson, Pima County, Arizona

d. Property Name and Address

None – Community-Wide

e. Contacts:

- | | |
|---------------------------------------|-----------------------------|
| i. Project Director: | ii. Chief Executive: |
| Carlos A. De La Torre, P.E. | Jonathan Rothschild, Mayor |
| PO Box 27210 | PO Box 27210 |
| Tucson, Arizona 85726-7210 | Tucson, Arizona 85726-7210 |
| Telephone: (520) 791-3175 | Telephone: (520) 791-4201 |
| E-mail: carlos.delatorre@tucsonaz.gov | E-mail: mayor1@tucsonaz.gov |

f. Population:

- i. Project Area: 528,374
- ii. Not Applicable
- iii. The jurisdiction is not located in a county experiencing persistent poverty

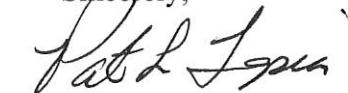
g. Regional Priorities Form/Other Factors Checklist

This form is attached.

h. Letter from the State Environmental Authority

This letter is attached.

Sincerely,



For - Carlos A. De La Torre, P.E.
Director

CT/rm

Enclosures: Grant Application and Supplements



ATTACHMENT A

REGIONAL PRIORITIES FORM AND OTHER FACTORS CHECKLIST



APPENDIX 3 - REGIONAL PRIORITIES FORM/OTHER FACTORS CHECKLIST

Name of Applicant: City of Tucson, Arizona

Regional Priorities Other Factor

If your proposed Brownfields Assessment project will advance the regional priority(ies) identified in Section 1.F., please indicate the regional priority(ies) and the page number(s) for where the information can be found within your 15-page narrative. Only address the priority(ies) for the region in which your project is located. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal, it will not be considered during the selection process.

Regional Priority Title(s): Leveraging New/Expanded Transit Investments to Reduce Air Pollution

Page Number(s): 12 and 13

Assessment Other Factors Checklist

Other Factor	Page #
<i>None of the Other Factors are applicable.</i>	
Community population is 10,000 or less.	
The jurisdiction is located within, or includes, a county experiencing “persistent poverty” where 20% or more of its population has lived in poverty over the past 30 years, as measured by the 1990 and 2000 decennial censuses and the most recent Small Area Income and Poverty Estimates.	
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Target brownfield sites are impacted by mine-scarred land.	
Project is primarily focusing on Phase II Assessments.	7, 8
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion, by identifying in the proposal the amounts and contributors of resources and including documentation that ties directly to the project.	7, 8, 9, Attachment D
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	



ATTACHMENT B

LETTER FROM ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

Via U.S. Mail and email

October 19, 2017

VRP17-078

Mr. Carlos A. De La Torre, P.E.
Director
City of Tucson, Environmental & General Services Department
PO Box 27210
Tucson, Arizona 85726-7210

Re: Brownfields Community-wide Assessment Grant for the City of Tucson

Dear Mr. De La Torre,

The Arizona Department of Environmental Quality (ADEQ) Brownfields Program is pleased to provide a letter in support of the City of Tucson's application to the Environmental Protection Agency (EPA) for a FY 2018 Brownfields Community-wide Assessment Grant.

ADEQ believes that the FY 2018 Brownfields Community-wide Assessment Grant will be a good use of funding. The grant is for \$300,000, which can be used for petroleum and hazardous waste assessments on residential, commercial, and industrial properties within the City of Tucson. The grant target area will be the *La Doce*, a 2.5 cultural and business district along the 12th avenue corridor between 44th street and Drexel Road in Tucson, Arizona. The goal of this grant is to provide funding sources to local property owners, businesses, and developers who need to conduct environmental site assessments as part of property acquisition and redevelopment. Additionally, the City plans to focus on transit orientated development to promote multi-modal planning and infrastructure development. The City's Brownfields Program in the past 20 years has successfully partnered with developers and local businesses, and assisted property owners with redevelopment and job creation.

It is our pleasure to support the City of Tucson and we look forward to continued success with the program. ADEQ fully supports the City of Tucson and stakeholders with their important Brownfields projects and we look forward to providing the communities and stakeholders with additional services and funding opportunities.

Sincerely,


Jennie E. Curé, Brownfields Coordinator
Voluntary Remediation Programs Unit Waste Program Division

Main Office

1110 W. Washington Street • Phoenix, AZ 85007
(602) 771-2300

Southern Regional Office

400 W. Congress Street • Suite 433 • Tucson, AZ 85701
(520) 628-6733

www.azdeq.gov

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1. COMMUNITY NEED

A. TARGETED AREA AND BROWNFIELDS

i. Community and Target Area Descriptions

Our target area is a 2.5-mile corridor along 12th Avenue comprised of portions of eight Census Tracts in southern Tucson, Arizona colloquially known as *La Doce*. The second largest city in Arizona, Tucson has a population of about 528,374, and is located in the Sonoran Desert, about 70 miles north of the border with Mexico. Tucson is one of the oldest permanently-settled US communities, from a Native American village called *Stook-zone*, to the Tucson Presidio established under Spanish rule in 1775. The Arizona territory was purchased from Mexico in 1854. *La Doce* was probably first occupied in the mid-1800s, and most development occurred before annexation by the City in 1960.

La Doce is a significant contributor to Tucson's cultural landscape, with homes and retail shops owned and catering to generations of Mexican-American and native families. The area is a distinctive cultural and business hub with an over 90% Hispanic population serving the needs of the community at affordable prices, and is home to some of Tucson's most celebrated Mexican restaurants. *La Doce* is a key segment of Visit Tucson's "Best 23 Miles of Mexican Food," and is the focus of Grayline Bus Tours "Best of the Barrio" food tours. *La Doce* was a primary reason Tucson was designated a UNESCO City of Gastronomy, the first such US designation.

La Doce lies south of Interstate 10, between Interstate 19 and Nogales Highway in a relatively isolated pocket of southern Tucson. This cultural enclave has a deep-rooted distrust of local government, partly because residents were displaced from the historical *Barrio Viejo* when it was razed in the 1960s, and others suffered potential long-term exposure to industrial solvent-impacted drinking water from a Superfund source. The area has since developed almost as a small, independent village with its own informal governance structure and economy.

La Doce is home to the second most heavily-used bus route, with 150,000 users per month according to the 2013 Drachman Institute *Community Planning and Project Evaluation, Volume IV: Commercial Corridors*; has two major bus lines to Mexico; and is heavily used by motorists, bicyclists, and pedestrians. Despite its heavy use and significance, 12th Avenue is severely lacking public investment. The sidewalk exists in short stretches, and lack of defined walking spaces between schools, bus stops, and businesses is dangerous for non-motorists. Poor infrastructure contributes to an impression the area is run down and blighted.

Zoning regulations were not established by Pima County until 1949 and *La Doce* was not annexed until 1960. Consequently, growth in the County occurred in unincorporated areas like *La Doce* with limited regulatory oversight and without adequate infrastructure and services. In the 1970s, residences along 12th Avenue began to transition to commercial uses, and many structures now either require significant renovation or have been abandoned. Additional Brownfields exist as vacant or abandoned lots that comprise 16% of the project area. These Brownfields are sometimes blighted and may have real or perceived environmental concerns, which dissuades private redevelopment and public infrastructure investment. We expect our inventory task to identify at least 60 Brownfields within the project area.

ii. Demographic Information and Indicators of Need

	<i>La Doce</i>	Tucson	Arizona	United States
Population	9,872 ¹	528,374 ¹	6,641,928 ¹	316,127,513 ¹
Unemployment	13.1 ¹	4.1% ²	5.0% ²	8.3% ¹



La Doce Cultural and Business Corridor
Brownfields Community-Wide Assessment Grant Application
Hazardous Substances and Petroleum Products

Poverty Rate	34.7% ¹	25.3% ¹	18.2% ¹	15.5% ¹
Percent Minority	90.7% ¹	54.2% ¹	43.5% ¹	37.8% ¹
Median Household Income	\$26,052 ¹	\$37,149 ¹	\$50,255 ¹	\$53,889 ¹

¹ 2011-2015 ACS 5-Year Estimates: https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml

² Bureau of Labor Statistics (August 2017); www.bls.gov

iii. Description of the Brownfields

Brownfields in *La Doce* are generally associated with: 1) unknown environmental issues (e.g., presence of former underground storage tanks, asbestos-containing building materials); or 2) properties for infrastructure improvements, business expansion, recreational/open space, and public safety and health benefits. Sites include abandoned, dilapidated, or underutilized former gasoline service stations, automotive repair facilities, tire shops, restaurants, and vacant/parking lots. Two priority sites were identified based on past use and redevelopment potential: Rafael's Tire Shop (3812 S. 12th Avenue) and Pueblo Transmission Shop (3318 S. 12th Avenue). These sites were selected because they are blighted, have a long history of automotive repair-related uses, have strong redevelopment potential, and are likely environmentally impacted.

9 registered Leaking Underground Storage Tank (LUST) sites are in *La Doce*,¹ and additional underground storage tanks, septic systems, and other environmental concerns are likely present. Businesses likely operated without air, wastewater, or stormwater permits, and may have released chemicals to the environment. Vacant lots and parking lots comprise one-third of the non-residential parcels in *La Doce*² and are a perceived source of environmental concern due to the unknown nature of past site activities. Brownfields sites are persistent throughout the project area, and have had negative environmental impacts on the community. Many building were constructed prior to the 1970s and are likely to contain lead-based paint and asbestos.

Residential and commercial parcel use in *La Doce* is roughly even with 55% residential use and 45% commercial use³. Most commercial usage lies along 12th Avenue with residential uses adjoining the commercial parcels. Therefore, residents live close to impacts from commercial facilities (light industrial, automotive repair), and blighted and underutilized properties.

B. WELFARE, ENVIRONMENTAL, AND PUBLIC HEALTH IMPACTS

i. Welfare Impacts

La Doce Brownfields have unknown/perceived environmental issues or are properties to be used for public infrastructure improvements, business expansion, recreational/open space use, and public safety and health benefits. The effects of these Brownfields are:

Inadequate Infrastructure and Pedestrian Safety and Health - The highest traffic count on 12th Avenue is about 21,700 automobiles per day⁴, significantly impacting pedestrian safety due to lack of crosswalks, sidewalks, and lighting. Parking lots extend to the street curb in many areas and ≈50% of properties are without sidewalks. Numerous vacant and parking lots do not have sidewalks or lighting. In Arizona, the main cause of pedestrian fatalities in 2016 was crossing the

¹ <http://megasearch.azdeq.gov/megasearch/>

² *La Doce, Supporting a naturally Occurring Cultural and business district on South 12th Avenue*; University of Arizona; college of architecture, Planning & Landscape Architecture; Spring 2016)

³ 2011-2015 American Community Survey 5-Year Estimates:

https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml

⁴ PAG Traffic Counts; Pima Association of Governments; <http://www.pagnet.org/Default.aspx?tabid=909>



street, accounting for 61% of all pedestrian deaths.⁵ More than half of the parcels in *La Doce* do not have lighting, and 70% of pedestrian fatalities occurred between 6:00 PM and 5:59 AM.⁶ *La Doce* is home to five major bus routes, with Route 16 having among the highest ridership in the Sun Tran system at 31.9 passengers per hour.⁷ With 27 bus stops along 12th Avenue, bus riders navigate inadequate infrastructure daily, including a lack of sidewalks, crosswalks, lighting and unsheltered bus stops offering no protection from summer temperatures often exceeding 100° F.

Blight, Undeveloped Properties - Beginning in the 1970s, 12th Avenue transitioned from a neighborhood avenue to a business corridor, and now 45% of the parcels are zoned commercial. Over 90% of the businesses are “mom-and-pop” owners, providing food or beauty services. About 17% of the parcels are vacant. Only 20% of small business owners own their commercial property, many of which do not meet current building codes. Bringing these buildings up to current code may require costly and significant property improvements, even if only minor repairs or improvements are made. Absentee building owners do not invest in the buildings, and small businesses cannot afford the renovation costs or do not have access to fair and equitable capital; therefore, some properties are blighted or vacated due to the high cost of potential improvements.

Lack of Recreational, Open Space, Healthy Options - *La Doce* lacks developed green space for recreational uses and aesthetic purposes; the two primary park spaces comprise considerably less than 1% of the project area. Lack of access to healthy food choices and unsafe infrastructure discourages alternative means of transportation, contributes to poor diet, and can lead to obesity, diabetes, and heart disease. The project area is a USDA-classified “food desert”, meaning residents do not have ready access to supermarkets or grocery stores within ½ mile of their residence. Brownfields properties prevent repurposing sites to community gardens, farmer’s markets, multi-use pedestrian paths, and stores with more-accessible, healthy food choices.

ii. Cumulative Environmental Issues

The Tucson Airport Remediation Project area of the Tucson International Airport Area Superfund groundwater plume underlies the southern portion of *La Doce*. Impacted surface and ground water has affected the low-income, Hispanic southside neighborhoods since the 1940s when nearby industries disposed a carcinogenic industrial degreaser. For several decades, southside residents, including those in *La Doce*, were unknowingly exposed to groundwater impacted by trichloroethylene (TCE). A Baseline Human Health Risk Assessment found southside residents had increased incidences of cancers, birth defects, and autoimmune diseases⁸.

I-10 and I-19 are less than ½ mile from *La Doce*, and have a significant impact on air quality. Vehicles account for 60% of air pollution in Pima County⁹ and about 170,000 vehicles travel on interstates near *La Doce*¹⁰. Tucson International Airport, located about 1 mile from *La Doce*, contributes to air and noise quality issues. Seven closed landfills totaling 89 acres are located less than 3 miles from *La Doce*. Several landfills, sources of groundwater contamination, are being cleaned up under the Water Quality Assurance Revolving Fund, Arizona’s equivalent to the Federal Superfund program.

⁵ *Arizona Motor Vehicle Crash Facts*; ADOT; 2016.

⁶ *Traffic Safety Facts; Pedestrians*; USDOT; 2015.

⁷ *Community Planning and Project Evaluation, Volume IV: Commercial Corridors*; Drachman Institute; 2013.

⁸ Baseline Human Health Risk Assessment; Arizona Department of Health Services; December 1996

⁹ Pima County, Department of Environmental Quality, <http://www.airinfoNOW.org/html/faq.html#Q21>.

¹⁰ Arizona Department of Transportation; HPMS Location Report for Year; 2016.



The EPA's Environmental Justice Screening and Mapping tool (EJSCREEN), calculating Environmental Justice (EJ) Indices for environmental and demographic information¹¹, showed *La Doce* residents had a higher risk factor than more than 90% of the US population in 8 of the 11 EJ Indices, 3 of which are related to environmental issues. 5 EJ Indices are directly related to our transportation and pedestrian issues.

iii. Cumulative Public Health Impacts

Almost all *La Doce* residents are members of a sensitive population. Over 90% of the population is of Hispanic ethnicity, and 1 in 7 residents speak Spanish only. The median household income is \$26,052, almost ½ of the Arizona and US averages. 34% of the population lives below the poverty line (15% and 18% in the US and Arizona, respectively). In almost 30% of these households, the incomes are supplemented with public benefits like Supplemental Nutritional Assistance Program (Food Stamps). The unemployment rate in the area is over three times the Tucson area's. The median age is 32.4 years, or 3 years younger than the average Arizona resident. Only 55% of the population aged 25 and over has a high school degree and only 5% have at least a bachelor's degree (US averages of 80% and 44.5%, respectively).

Opportunities for physical activity are limited in *La Doce*, partially because of the prevalence of Brownfields, lack of access to open space, and poor pedestrian environment. Almost one-third of the Hispanic population does not engage in physical activity. County data supports this to be an issue locally, with only 45% of Pima County children reaching CDC goals for physical activity, and another 15% failing to do 60 minutes of activity any day of the prior week.¹² The data shows *La Doce* residents are at a significant risk for developing chronic diseases.

Obesity is a known contributor to diabetes, cardiovascular diseases, and other severe health impacts. Over 25% of Pima County is obese. The Arizona Department of Health Services (ADHS) found Hispanics have a higher rate of diabetes than most other ethnicities¹³, and Hispanics faced a higher burden of disease than many other groups.¹⁴ The Pima County Health Status Compendium reported heart diseases and cardiovascular disease are the two leading causes of death for Hispanics. More than a quarter of Hispanics reported having high blood pressure; however, nearly one-third were not taking medication that could reduce their risk for heart attack and stroke.¹⁵ The lower average income of *La Doce* residents is linked to a higher rate of diabetes and obesity. Trust for America's Health reported 33% of adults who earn less than \$15,000 annually were obese, compared with 25% who earned at least \$50,000.¹⁶ This population had more than twice the rate of diabetes than their wealthier counterparts.

C. FINANCIAL NEED

i. Economic Conditions

The Tucson economy is slowly recovering from the Great Recession, and remains well behind most of the country in job creation. Our region relies heavily on defense spending, and Federal budget cuts could impact Raytheon, the largest employer in the region. The University of

¹¹ EPA; <https://www.epa.gov/ejscreen>

¹² *State of County's Health Presentation*; PCHD; 2014.

¹³ *Arizona Diabetes Burden Report*; Arizona Department of Health Services; 2011.

¹⁴ *Difference in Health Status Among Racial/Ethnic Groups*; ADHS; 2015.

¹⁵ CDC; Million Hearts; 2013

¹⁶ *F: As in Fat: How Obesity Threatens America's Future*; Robert Wood Johnson Foundation; 2012.



Arizona, a key player in the economy, lost about \$20 million in funding due to the State's recent budget cut.¹⁷ Tucson was ranked last out of 505 US cities in a 2017 WalletHub study measuring the progress of local economies recovering from the Great Recession.¹⁸

Private and public investments over the last decade did not include areas such as *La Doce*. In 2016, the County's bond package included funding for the "South 12th Avenue Cultural and Culinary Corridor" project consisting of infrastructure improvements to create a safer and aesthetically pleasing multi-modal corridor; however the bond package failed and the project was not funded. The State of Arizona does not have a Brownfields Revolving Loan Fund and has limited money available in its 128(a) program for assessments in non-rural areas.

ii. Economic Effects of Brownfields

Brownfields sites in *La Doce*, such as those described in Section 1(A)(iii), present tremendous economic challenges for our community. Limited parking and sidewalk connectivity contribute to an unsafe and unwelcoming business district, resulting in restricted business expansion and investment, inability to attract new customers, and lost business and tax revenue. As a result, businesses move, buildings become dilapidated, property values are reduced, and the tax base either reduces or stagnates. The economic effects directly impact public safety as the City and County do not have funding to make necessary infrastructure improvements

In comparison, Historic 4th Avenue near the University of Arizona campus, experienced similar challenges in the 1980s but is now is a vibrant food and entertainment district thanks to public and private investments, most notably the Modern Streetcar. Property values along 4th Avenue are on average double those in *La Doce*, clearly demonstrating the Brownfields impacts.

2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS

A. DESCRIPTION, REDEVELOPMENT STRATEGY, AND IMPLEMENTATION

i. Project Description and Alignment with Revitalization Plans

Our project will improve safety, walkability, regional identity, and aesthetics in a unique Mexican-American cultural and business district. Established cultural enclaves provide examples of how local businesses and residents create spaces celebrating identity, history, traditions, and culture. The project will spur commercial investment; reduce air pollution and blight; and increase culinary and cultural tourism for thousands of pedestrians, bicyclists, transit users, and motorists who use 12th Avenue.

La Doce planning efforts initiated in the 1990s include City/County plans, health studies, transportation/revitalization plans/projects, and bond improvement efforts. Our project directly aligns with design and planning recommendations in *La Doce - Supporting a Naturally Occurring Cultural and Business District on South 12th Avenue* such as economic development, public safety, placemaking, and displacement prevention. It supports the voter-approved General and Sustainability Plan (Plan Tucson) in the elements of Urban Agriculture, Jobs and Workforce Development, Tourism and Quality of Life, and Redevelopment and Revitalization. The Land Use Code was also amended to make it easier to grow food, raise animals, operate food stands, and hold farmers markets.

¹⁷ *Tucson Area Continues making Slow Economic Recovery*; AZCentral; June 5, 2015

¹⁸ *2017's Most & Least Recession-Recovered Cities*; WalletHub; January 11, 2017



This project will address environmental justice concerns of *La Doce* residents, including those displaced from the historic *Barrio Viejo*, and others who suffered long-term potential exposure to industrial solvent-impacted drinking water. We will work with community non-profit organizations providing program outreach, health monitoring, and site inventory. Brownfields activities will be prioritized based on community involvement and input activities, assuring the needs of the community are met. The Brownfields grant will directly advance and incorporate sustainable and equitable development outcomes:

- **Provide better transportation choices** - facilitate property development and infrastructure improvements to improve walkability and provide viable alternative transportation options.
- **Support existing communities** - preserve a culturally-significant area through redevelopment, job creation, and sustainable growth; increase public works investments; remove environmental hazards impacting redevelopment and health and safety.
- **Enhance economic competitiveness** - attract new sustainable businesses encouraging employment opportunities and resources to expand and/or increase the tax base.
- **Value communities and neighborhoods** - enhance the unique characteristics of *La Doce* and develop safe, healthy, walkable neighborhood; increase local-owned business property ownership (currently at 20%); retain long-time residents and families.

ii. Redevelopment Strategy

Redevelopment will focus on advancing economic development, public safety and health, cultural preservation, and neighborhood preservation. Our focus will be: 1) the 442 *La Doce* businesses, of which 253 are located on 12th Avenue, and 2) 17% of *La Doce* parcels identified as vacant or parking lots.¹⁹ Much of the existing infrastructure is inadequate, and one project outcome is improved walkability and safety. Our project will make use of existing infrastructure, such as sidewalks, traffic controls, electrical, water, stormwater/wastewater, and intranet. Pima County and Tucson recently invested in the area, including a \$3.1 million repaving and bike lane project on 12th Avenue, completed in April 2017. Bike racks are being installed at 4 businesses.

iii. Timing and Implementation

(a) Contractor Procurement - Tucson contracts with four Brownfields/environmental consultants, who were selected using a competitive, qualifications-based proposal process that meets EPA procurement standards required for Federal grant funding (including consideration for disadvantaged, minority, and small businesses). The existing contract is renewable through 2020, and we expect these contractors will be used throughout the grant period. Existing contracts will be used for community outreach and planning services or they will be competitively bid to obtain services to support this Brownfields grant.

(b) Site Inventory/Identification and Site Prioritization and Selection - The City will hire a consultant to work with trusted community groups to develop its first comprehensive Brownfields inventory of the area. Stakeholders will help develop site prioritization and selection criteria (e.g. location, past use, known contamination, redevelopment potential) for *La Doce*. Properties advancing the project goals will be prioritized within 4 months of grant award.

(c) Site Access - Once a site is identified and slated for assessment, the City will meet with the owner and explain the site assessment process, including potential reporting to EPA. The owner

¹⁹ *La Doce, Supporting a naturally Occurring Cultural and business district on South 12th Avenue*; University of Arizona; college of architecture, Planning & Landscape Architecture; Spring 2016)



will sign an Access Agreement and we will schedule a time to perform the site review to assess the site. We will hire a community group to assist us with site access issues.

B. TASK DESCRIPTIONS AND BUDGET TABLE

i. Task Descriptions

The City's proposed program consists of five Tasks: 1) Program Management; 2) Public Engagement; 3) Health Monitoring; 4) Inventory; and 5) Environmental Assessments. Specific activities and deliverables to be completed as part of each Task are listed below, along with the program outcomes the Task will support. Over 80% of the Federal Funding will be used directly for environmental assessments, with over half dedicated to Phase II ESAs.

The City's expected outputs from this Assessment grant include: Prepare Quality Assurance Project Plan and Community Involvement Plan; complete Phase I ESAs, Phase II ESAs, Asbestos Surveys, and ABCAs; compile and maintain Brownfields Inventory on GIS platform; and complete a Health Monitoring Report as detailed below.

Task 1: Program Management - Travel to national/regional conferences/workshops, training, and meetings with other Brownfields programs. Direct costs for programmatic and financial grant management (reporting and environmental oversight) provided as in-kind services by Tucson, estimate - \$25,200.

Cost Basis (Petroleum Products) – Total: \$5,000

Travel (City of Tucson): 1 person @ 2 conference/year (over 3 years) = \$5,000

Cost Basis (Hazardous Substances) – Total: \$5,000

Travel (City of Tucson): 1 person @ 2 conference/year (over 3 years) = \$5,000

Task 2: Public Engagement - Actively engage community stakeholders through regular meetings coordinated with assistance from local non-profit organizations. Prepare Community Involvement Plan, outreach/promotional materials, and maintain website and social media. In-kind personnel costs estimate - \$29,575.

Cost Basis (Petroleum Products) – Total: \$1,600

Supplies: Outreach materials (fliers, handouts) = \$900

Contractual: Development of outreach materials (design, artwork) = \$300

Other: Advertising and Postage - \$400

Cost Basis (Hazardous Substances) – Total: \$1,600

Supplies: Outreach materials (fliers, handouts) = \$900

Contractual: Development of outreach materials (design, artwork) = \$300

Other: Advertising and Postage - \$400

Task 3: Health Monitoring - Conduct Health Monitoring in partnership with Pima County Health Department (PCHD) and local non-profits by collecting health and environmental data, such as personal health and health habits; health care facilities; recreational, greenspace, and public space; transportation; and other data to be used to improve resident health and guide redevelopment planning. In-kind personnel costs estimate - \$26,775.

Cost Basis (Hazardous Substances) – Total: \$7,000

Contractual: (PCHD and non-profit) Health Monitoring Plan = \$7,000

Cost Basis (Hazardous Substances) – Total: \$7,000

Contractual: (PCHD and non-profit) Health Monitoring Plan = \$7,000

Task 4: Inventory - Compile Brownfields inventory and update GIS-based inventory management system for target area. Prioritize properties for future assessment. In-kind personnel costs estimate - \$21,175.



La Doce Cultural and Business Corridor
Brownfields Community-Wide Assessment Grant Application
Hazardous Substances and Petroleum Products

Cost Basis (Petroleum Products) – Total: \$10,900

Personnel (City of Tucson): 160 hours @ \$15.00 per hour = \$2,400

Contractual (consultant & non-profit): Brownfields Inventory = \$8,500

Cost Basis (Hazardous Substances) – Total: \$10,900

Personnel (City of Tucson): 160 hours @ \$15.00 per hour = \$2,400

Contractual (consultant & non-profit): Brownfields Inventory = \$8,500

Task 5: Environmental Assessments - Develop EPA-approved QAPP and SAPs. Complete Eligibility Determinations and Phase I ESAs following ASTM E1527-13, complete Phase II ESAs, asbestos surveys (Hazardous), and ABCAs. In-kind personnel costs (ACRES reporting) estimate - \$85,750.

Cost Basis (Petroleum Products) – Total: \$95,500

Contractual (consultant): Quality Assurance Project Plan = \$3,000

Contractual (consultant): 8 Phase I ESAs @ \$3,500 per Phase I ESA (average) = \$28,000

Contractual (consultant): 3 Phase II ESAs @ \$17,500 per Phase II ESA (average) = \$52,500

Contractual (consultant): 2 ABCAs @ \$6,000 per ABCA = \$12,000

Cost Basis (Hazardous Substances) – Total: \$155,500

Contractual (consultant): Quality Assurance Project Plan = \$3,000

Contractual (consultant): 11 Phase I ESAs @ \$3,500 per Phase I ESA (average) = \$38,500

Contractual (consultant): 5 Phase II ESAs @ \$17,500 per Phase II ESA (average) = \$87,500

Contractual (consultant): 5 Asbestos Surveys @ \$2,900 per survey (average) = \$14,500

Contractual (consultant): 2 ABCAs @ \$6,000 per ABCA = \$12,000

ii. Budget Table

PROJECT TASKS - PETROLEUM PRODUCTS BUDGET						
Budget Categories	Task 1: Program Management	Task 2: Community Engagement	Task 3: Health Monitoring	Task 4: Inventory	Task 5: Site Assessments	TOTAL
Personnel				\$2,400		\$2,400
Travel	\$5,000					\$5,000
Supplies		\$900				\$900
Contractual		\$300	\$7,000	\$8,500	\$95,500	\$111,300
Other		\$400				\$400
Total Budget	\$5,000	\$1,600	\$7,000	\$10,900	\$95,500	\$120,000
PROJECT TASKS - HAZARDOUS SUBSTANCES BUDGET						
Budget Categories	Task 1: Program Management	Task 2: Community Engagement	Task 3: Health Monitoring	Task 4: Inventory	Task 5: Site Assessments	TOTAL
Personnel				\$2,400		\$2,400
Travel	\$5,000					\$5,000
Supplies		\$900				\$900
Contractual		\$300	\$7,000	\$8,500	\$155,500	\$171,300
Other		\$400				\$400
Total Budget	\$5,000	\$1,600	\$7,000	\$10,900	\$155,500	\$180,000
TOTAL REQUESTED FUNDING						\$300,000



C. ABILITY TO LEVERAGE

1. Sources of Funding to Ensure Project Success

The City of Tucson has clearly demonstrated its capacity and financial commitment to meet outputs listed in our six previous Brownfields Work Plans. We have three environmental professionals dedicated to this program, and as shown in Section 2(B)(i), we are committed to providing at least \$188,475 (63% leveraging) from in-kind services to manage this grant.

2. Sources of Funds to Ensure Revitalization Brownfields Sites

The City repaved 12th Avenue from 44th Street to Santa Paula Street using about \$3.4 million Proposition 409 Road Recovery Bond funds in 2016. \$100,000 in funding from a Tohono O'Odham gaming grant and City of Tucson Litter Fees was used to construct 3 bus shelters and pads, landscaping improvements, and signage. The City has an EPA Brownfields Assessment grant with remaining funds, and we are submitting a FY18 Revolving Loan Fund grant application for Brownfields cleanup. The City offers several business incentive programs that can be used to leverage Brownfields funding to assure required assessment, including:

- **Tucson Community Development Loan Fund** - \$20 million HUD 108 loan fund that can be used as gap financing for projects creating jobs for low- and moderate-income persons, eliminate blight, or meet urgent community needs. Eligible activities include real property acquisition, rehabilitation of real property, relocation, clearance and demolition, site preparation, public facilities improvements, issuance costs, capitalized interest and reserves.
- **New Market Tax Credit Program** - Attracts investment capital to low-income communities by permitting corporate investors to receive a tax credit against their Federal income tax return in exchange for making equity investments in specialized financial institutions called Community Development Entities.
- **Tucson Industrial Development Authority Bonds and Loans** - May provide financing of projects whenever appropriate and where traditional sources of funding may not be available. Projects must serve a public purpose.

The Arizona Department of Environmental Quality's (ADEQ) UST Pre-Approval Program allows owners to receive up to \$1 million reimbursement per site for cleanup conducted in accordance with an ADEQ-approved scope of work, schedule, and budget. The City will provide technical direction to owners.

La Doce is less 2 miles from the Rio Nuevo Multi-Purpose Facilities District, created in 1999 to establish a Tax Increment Funding (TIF) district. In the past 5 years, leveraged TIF funding attracted over \$250 million in private investment into Rio Nuevo. In addition, Pima County, Tucson, and South Tucson are working to develop a comprehensive redevelopment plan for a 2-mile stretch of I-10 north of the project area, heading east. *La Doce's* proximity to both projects provides excellent opportunities to leverage Brownfields funding to attract businesses that complement these larger redevelopment projects.

Source	Purpose/role	Amount	Status
City of Tucson	In-kind services to manage grant	\$188,475	Secured
EPA Brownfields Assessment Grant	Environmental site assessments, cleanup planning (Attachment D)	\$175,918	Secured
ADEQ LUST Pre-Approval	Reimbursement for LUST cleanup	\$1,000,000/site	Potential
EPA Brownfields Revolving Loan Fund	Loans and subgrants for environmental cleanup	\$1,000,000	Potential



3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS

A. ENGAGING THE COMMUNITY

i. Community Involvement Plan

The collaboration for improving *La Doce* has included grassroots community organizations, local non-profits, elected and community leaders, pedestrian safety advocates, local businesses and residents, schools, and more. Although these community stakeholders may have markedly different values and interests, they rallied around the need for investing in pedestrian safety, economic development, and infrastructure equity. Tangible results are appearing thanks to the advocacy of these organizations and individuals. Recent *La Doce* projects range from area planning, roadway milling and paving, gateway art, pedestrian amenities, to installation of bus shelters, landscaping, and signage.

One such planning and community effort was *La Doce - Supporting a Naturally Occurring Cultural and Business District on South 12th Avenue*. Small business owners cited small business loans, better signage, more pedestrian traffic, and improved curb appeal as ways they can be helped most. The average resident participating in the survey lived in the area for 20 years. Many residents want new pedestrian walkways and landscaping, community areas, improved aesthetics, safety, more businesses, and redevelopment of existing features and buildings. We will continue to engage the community and we anticipate engaging at least one community organization to assist with the Health Monitoring and the Brownfields inventory.

ii. Communicating Progress

The means of communicating project progress are listed below. Information will be provided in English and Spanish, and interpreters will be present for meetings.

- One-on-one meetings with stakeholders (primary method of communication)
- Distribute information via existing neighborhood association newsletters to encourage participation and provide updates on key project milestones
- Establish a stakeholder group consisting of neighborhood representatives, business leaders, non-profit organizations, and the City of Tucson
- Post regular project updates and information to the City's website and social media
- Hold public meetings at key project milestones

For many years, southside residents unknowingly used drinking water from wells impacted with TCE. In the 1960s, the City razed a largely Hispanic *barrio* to build the Tucson Convention Center, displacing hundreds of long-time residents, some of whom relocated to the *La Doce* area. The residents strongly believed their concerns were ignored during these and other conflicts, thereby creating distrust of government and resistance to engaging in public processes. Therefore, the community organization assisting with the health monitoring and Brownfields inventory will also help us dialog with the community.

B. PARTNERSHIPS WITH GOVERNMENT AGENCIES

i. Local/State/Tribal Environmental Authority

The City has a long-standing relationship with ADEQ, particularly with the Brownfields program. We have participated as speakers in several conferences with ADEQ's Brownfields Program Manager, Jennie Curé. We will continue to work with ADEQ to assure only eligible sites are assessed and properly cleaned up. We will encourage property owners to participate in ADEQ's Voluntary Remediation Program (VRP). VRP allows property owners, prospective purchasers, and other interested parties to investigate or clean up a contaminated site in



cooperation with ADEQ. ADEQ reviews voluntary remedial actions and provides a closure document (No Further Action determination) for successful site remediation accepted by all relevant ADEQ programs.

ii. Other Governmental Partnerships

The City recognizes our successful Brownfields programs have resulted from stakeholder input into Brownfields redevelopment. These partners provided technical and administrative direction to ensure the grant funds were meaningfully expended. Specific stakeholder groups the City will continue to maintain an active partnership with include:

- EPA Region 9 - We communicate frequently with our EPA Project Manager, José Garcia, for technical and administrative questions, and will continue to work with Mr. Garcia, Noemi Emeric-Ford, Derrick Williamson, and other Region 9 staff to assure program success.
- Pima County and City of South Tucson - Successful Brownfields grantees and frequent collaborators on Southern Arizona Brownfields projects and programs.
- Pima County Health Department - Facilitates health screening for residents, provides health effects data and technical assistance, and assists with the Health Monitoring.
- Arizona State Historic Preservation Office - Determine if sites are historic or contain cultural resources. The City complies with all requirements of the NHPA.
- Arizona Game and Fish Department - Determines if endangered species may be impacted by site assessment activities. The City complies with all applicable requirements of the Endangered Species Act.
- Pima County Department of Environmental Quality – Environmental technical assistance.

C. PARTNERSHIPS WITH COMMUNITY ORGANIZATIONS

i. Community Organization Descriptions and Roles

The following organizations will serve in an advisory role for the project. Letters of commitment from these organizations are included in Attachment E.

Southside Business Coalition Francisca Villegas, Executive Director; (520) 260-1367; FVillegas@ywcatuson.org
Description: <i>La Doce</i> advocacy group consisting of 50+ local businesses. Role: assist with inventory, Health Monitoring Report; other outreach; planning.
The Common Group Guillermo Gallegos; (520) 909-5515; info@thecommongroup.com
Description: Local development company specializing in south Tucson. Role: Community outreach; redevelopment planning and technical assistance.
Tucson Clean and Beautiful Tom Ellis, Executive Director; (520) 791-3107; tom.ellis@tucsonaz.gov
Description: Non-profit environmental advocacy group formed to preserve and improve environment, conserve natural resources, and enhance quality of life in Tucson. Role: Community outreach, planning
Tucson Urban League, Inc. (TUL) Deborah Embry, President & CEO; (520) 791-0952; debembry@tucsonurbanleague.org
Description: Non-profit organization offering programs and services to create new businesses, expand existing businesses, and attract companies that offer high impact jobs. Role: Identify potential workers, outreach, planning



Primavera Foundation

Peggy Hutchison, Chief Executive Officer; (520) 308-3096, phutchinson@primavera.org

Description: Non-profit organization providing pathways out of poverty through safe, affordable housing, workforce development, and neighborhood revitalization.

Role: Identify potential workers, outreach, planning.

Healthy South Tucson

Lorenzo Gonzalez, President; (520) 603-3439, lgonzalez@geotekusa.com

Description: Coalition to creatively and practically address health and well-being needs of South Tucson residents.

Role: Community outreach and advocacy

ii. Letters of Commitment

Letters of commitment are provided in Attachment E.

D. PARTNERSHIPS WITH WORKFORCE DEVELOPMENT PROGRAMS

The City partnered with three workforce development agencies to assure residents are provided an opportunity to obtain employment and benefit from revitalization and environmental cleanup. We will meet with these entities quarterly to identify potential job opportunities for their clients. Letters of commitment from TUL and Primavera Foundation are provided in Attachment E.

- TUL received an EPA FY2016 Brownfields Environmental Workforce Development and Job Training (EWDJT) grant in FY16. The grant targets young adults ages 16 to 24, who are typically out-of-school, underserved, underemployed, or unemployed. Students are provided weatherization, construction, safety, construction math, OSHA safety, and employment skills training. The EWDJT funds additional environmental certifications.
- Primavera Foundation annually impact more than 8,000 individuals and families living in Southern Arizona, many of whom are homeless. Primavera Works, a social enterprise of the Primavera Foundation, helps the homeless transition to a stable lifestyle by providing safe, affordable housing; employability skills training; and ethical day-labor opportunities.
- The Pima County Sullivan-Jackson Employment Center (SJEC) was constructed on a Brownfields site in South Tucson, and assessed using Brownfields grant funds. SJEC's mission is to provide assistance and training for homeless and unemployed individuals.

The City will assure local residents can participate in assessment and cleanup of their community. We will notify our environmental consultants when job training graduates are ready for employment and encourage them to consider these candidates for employment opportunities, especially for Brownfields-related cleanups.

4. PROJECT BENEFITS

A. WELFARE, ENVIRONMENTAL, AND PUBLIC HEALTH BENEFITS

Brownfields funding will encourage redevelopment of a safer, healthier community, while incorporating smart growth principles. This project will support EPA Region 9's Regional priority of Leveraging New/Expanded Transit Investments to Reduce Air Pollution.

EPA funding will address community needs for safe, walkable infrastructure; healthy lifestyle alternatives; economic development, and cultural preservation. The grant will support *La Doce* redevelopment, such as roadway improvements; access to community gardens, agricultural areas, and other healthy food options; construction of crosswalks and sidewalks; business expansion; provision of parks, recreational facilities, and greenspace; reduce heat island effects; and improve air quality and stormwater management.



This project will address environmental justice concerns held by *La Doce* residents, including those displaced from the historic *Barrio Viejo*, and others who potentially suffered long-term exposure to industrial solvent-impacted drinking water. Community non-profit organizations will assist with program outreach, health monitoring, and site inventory. Brownfields activities will be prioritized based on community involvement and input activities, thereby providing the community a real voice in the process. This process will assure the needs of this under-resourced community are effectively met and the program is sustainable.

Health monitoring will be conducted in partnership with the PCHD. Data will be collected to support the goals of the *2013-2017 Pima County Community Health Improvement Plan (CHIP)*, created to examine the health needs of County residents. Community, health, and environmental data will be collected to improve resident health and guide redevelopment planning. Data will support infrastructure, recreational, and green space improvements to encourage physical activity and develop public spaces like community gardens. *La Doce* residents do not have ready-access to healthy food options, and the lack of access contributes to a poor diet and can lead to higher levels of obesity and other diet-related diseases, such as diabetes and heart disease. Independent ethnic groceries, like the Hispanic *carnicería*, historically have played a pivotal role in bringing healthy, culturally-appropriate, and affordable food choices into low-income communities and reducing food insecurity. Brownfields funding can be made available to small business owners, 80% of whom rent their business structures.

Vehicle mileage, a major cause of air pollution in Tucson, will be reduced as pedestrians and bicyclists take advantage of infrastructure improvements made possible by the Brownfields grant. Potential environmental concerns (such as the presence of underground storage tanks, septic systems, former on-site commercial or industrial activities, etc.) likely exist in *La Doce*. Vacant lots and parking lots comprise almost 20% of the parcels, and many lay undeveloped, partially due to unknown past site activities. Because many buildings were built prior to the 1970s, almost half of the structures could have asbestos-containing building materials and/or lead-based paint. These environmental issues can be adequately addressed using Brownfields assessments.

B. ECONOMIC AND COMMUNITY BENEFITS

Pima County, Tucson, and other stakeholders have studied and invested millions in an attempt to create a successful business and cultural district in *La Doce*. With targeted investment and continued business and public engagement, the corridor can become a culturally relevant public space and tourist destination comparable to Olvera Street in L.A. or the Mission District in San Francisco. Investing in *La Doce* will promote tourism, support development of local and regional businesses, improve safety and connectivity on a regionally significant transportation route, and complete the investments begun by Pima County in 1997. Without the proper pedestrian infrastructure and support, this area will remain uninviting for those unfamiliar with the corridor.

Businesses, governments, and community leaders recognize the importance of the region's economic ties with Mexico. South 12th Avenue is the terminus of two major Mexican bus lines, an alternate route into downtown Tucson, and the heart of neighborhoods with generations of Mexican-American heritage. It is a gateway by which many Mexican visitors enter the region, a nationally recognized culinary destination, and has served as a successful business incubator.

Brownfields redevelopment will increase property tax revenues from former Brownfields properties; promote business expansion on ten Brownfields properties; and support redevelopment of three former Brownfields properties to provide a public benefit such as a food bank, recreational facility, park, community garden, or other similar use.



5. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

A. AUDIT FINDINGS

The City of Tucson has not received any adverse audit findings. The City of Tucson is not, nor has previously been, required to comply with special “high risk” terms and conditions under agency regulations implementing OMB Circular A-102.

B. PROGRAMMATIC CAPABILITY

Tucson’s Environmental & General Services Department (EGSD), Sustainability Programs, Engineering, and Technical Support Section will manage this grant. The section has an annual budget of \$3.89 million and has 13 environmental professionals, 3 of whom are dedicated to overseeing the Brownfields Program. Since 1997, we have managed \$3.2 million in Brownfields grants. We have technical expertise in site assessment, remediation, systems operations and maintenance, regulatory compliance, and GIS. The City’s Brownfields Program has successfully managed Brownfields Assessment, Cleanup, and EWDJT grants. Staff are very familiar with the terms and conditions of Cooperative Agreements and have instituted proven programs to assure compliance and the City of Tucson’s environmental consultants support the efforts of the Brownfields team providing technical skill and extensive experience and familiarity with the Brownfields Program. The City’s award winning Procurement department will select consultants using a competitive, qualifications-based proposal process that meets EPA procurement standards required for federal grant funding.

EGSD Director, Carlos De La Torre, P.E., will provide overall direction and leadership of this Brownfields grant. Mr. De La Torre has worked for several cities and Cochise County in capacities ranging from Senior Engineering Associate to City Manager. Mr. De La Torre holds a bachelor’s degree in Civil Engineering and a Master’s in Business Administration. EGSD Environmental Manager Richard Byrd, CHMM, will provide senior technical review. Mr. Byrd has 29+ years of experience conducting environmental assessments, remediation system design and installation, and regulatory compliance. Day-to-day grant management will be conducted by Kayla Virgone and Rolanda Mazeika. Ms. Virgone earned her M.S. in Soil Water and Environmental Science, and specializes in technical review and oversight of Brownfields projects. Ms. Mazeika has 10 years of administrative support experience including project and financial management, public outreach, and contract management. She will provide administrative oversight to assure grant terms and conditions are met. Ms. Virgone and Ms. Mazeika each have 1 year experience in Tucson's Brownfields Program.

C. MEASURING ENVIRONMENTAL RESULTS: OUTPUTS/OUTCOMES

Outputs to be accomplished with this grant are listed in Section 2(B)(i). The City will prepare a Work Plan with quantitative goals and a schedule. Project outputs, outcomes, and results will be measured against Work Plan commitments, documented in the Quarterly Report and final reports, and updated in ACRES quarterly. In the unlikely event program objectives are not accomplished according to schedule, we will identify the cause(s), discuss solutions with EPA, and implement the measure(s) within 1 quarter. Outputs and outcomes to be measured include:

Output	Outcome
<ul style="list-style-type: none">▪ Prepare QAPP and CIP▪ Complete Phase I ESAs (8 Petroleum / 11 Hazardous)▪ Complete Phase II ESAs &	<ul style="list-style-type: none">▪ Increase local business ownership from 20% to 50%▪ Create a more walkable, safe 12th Avenue▪ Redevelop 3 former Brownfields properties to provide a public benefit such as a food bank, recreational facility,



<p>SAPs (3 Petroleum / 5 Hazardous)</p> <ul style="list-style-type: none"> ▪ Complete asbestos surveys (5 Hazardous) ▪ Update and maintain Brownfields Inventory ▪ Prepare ABCAs (2 Petroleum / Hazardous) ▪ Complete Health Monitoring Report 	<p>park, community garden, etc.</p> <ul style="list-style-type: none"> ▪ Strengthen/protect the cultural identity of <i>La Doce</i> and preserve neighborhoods by minimizing resident displacement ▪ Eliminate food deserts in 4 of 8 Census Tracts ▪ Capitalize on the area's culinary reputation ▪ Increase property tax revenues ▪ Expand or build new businesses on 10 Brownfields ▪ Healthier residents with improved access to recreational amenities
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D. PAST PERFORMANCE AND ACCOMPLISHMENTS

(i) Currently or Has Ever Received an EPA Brownfields Grant

1. Accomplishments

The City has received six Brownfields grants, and has met or exceeded outputs listed in the Work Plan. Outputs and outcomes were accurately reported in ACRES at the time of this submittal. The significant accomplishments of four recent grants are listed below.

Community-Wide Brownfields Assessment (FY2014) - \$400,000 (open; \$175,918 remaining)

Completed 5 Phase I ESAs, 9 Phase II ESAs, and 2 Remediation Work Plans; performed ongoing community outreach; and leveraged \$240,000 and created 10 redevelopment jobs.

Community-Wide Brownfields Assessment (FY2010) - \$400,000 (closed; \$0 remaining).

Completed 82 Phase I ESAs, 16 Phase II ESAs, and 1 Remediation Work Plan; updated Brownfields site inventory system; assessed properties for low-income housing and transit improvements, including Downtown Links, a multi-modal transportation link through downtown Tucson; leveraged over \$5 million in downtown redevelopment projects; and created 161 jobs.

Old Fort Lowell Restoration Cleanup (FY2009) - \$200,000 award (closed; \$0 remaining)

Completed EPA-approved Remedial Work Plan; completed Arizona State Historic Preservation Office (SHPO)-approved Archaeology Monitoring Plan and Memorandum of Agreement between SHPO, EPA, and City; completed ADEQ-reviewed remedial activities and Final Remedial Report to ADEQ; received No Further Action (NFA) determination letter from ADEQ.

Community-Wide Brownfields Assessment (FY2005) - \$400,000 award (closed; \$0 remaining)

Developed GIS-based system for Brownfields inventory; completed 22 Phase I ESAs and 6 Phase II ESAs; and leveraged over 9.9 million in downtown redevelopment projects

2. Compliance with Grant Requirements

The City has met EPA Cooperative Agreement requirements, including: adherence to Federal procurement requirements; submitted Work Plans, Quarterly Reports, and annual/final reports; updated ACRES in a timely manner: received EPA or ADEQ approval of Eligibility Determinations and EPA approval of QAPP and SAPs prior to initiating work; completed All Appropriate Inquiry checklist; and surpassed grant outcomes and outputs. The FY14 Community-Wide Assessment grant (Period 10/1/14-9/30/18) is open and has \$175,918 funds remaining. We received a 1-year extension from EPA and will expend all funds by September 2018. The remaining five EPA Brownfields were closed with \$0 in funding remaining. We have \$55,300 in planned spending for a Phase I ESA for future HUD housing; asbestos surveys for planned student housing; travel and training; and Remediation Work Plan. All grant funds will be exhausted by September 2018, so funds will not be able to be used for projects in *La Doce*.



ATTACHMENT C

THRESHOLD CRITERIA



ATTACHMENT C THRESHOLD CRITERIA

1. Applicant Eligibility

The City of Tucson is a General Purpose Unit of Local Government as defined under 40 CFR Part 31.

2. Community Involvement

The City of Tucson has created a plan to involve the community and other stakeholders during the planning, implementation and other assessment activities for this grant project. The City's community involvement plan can be found in Section 3 of the attached proposal and letters of support from community partners can be found in Attachment E.


3. Site Eligibility and Property Ownership Eligibility

This grant application is for Community-Wide Assessment, not Site-Specific Assessment. Therefore, this criteria is not applicable to this application.



ATTACHMENT D

DEMONSTRATION OF LEVERAGED RESOURCES

	U.S. ENVIRONMENTAL PROTECTION AGENCY Assistance Amendment		GRANT NUMBER (FAIN): 99T19401		DATE OF AWARD 06/22/2017	
			MODIFICATION NUMBER: 1			
			PROGRAM CODE: BF		TYPE OF ACTION No Cost Amendment	MAILING DATE 06/22/2017
			PAYMENT METHOD: Advance		ACH# 90402	
RECIPIENT TYPE: Municipal			Send Payment Request to: Las Vegas Finance Center email: lvfc-grants@epa.gov or Fax (702) 798-2423			
RECIPIENT: City of Tucson - Environmental Services P. O. Box 27210 Tucson, AZ 85726 EIN: 86-6000266			PAYEE: City of Tucson P. O. Box 27210 Tucson, AZ 85726			
PROJECT MANAGER		EPA PROJECT OFFICER		EPA GRANT SPECIALIST		
Kayla Virgone P. O. Box 27210 Tucson, AZ 85726 E-Mail: kayka.virgone@tucsonaz.gov Phone: 520-631-9350		Jose Garcia 75 Hawthorne Street, SFD-6-1 San Francisco, CA 94105 E-Mail: garcia.jose@epa.gov Phone: 213-244-1811		Maria Roverso Grants Management Office, EMD-6-1 E-Mail: roverso.maria@epa.gov Phone: 415-972-3573		
PROJECT TITLE AND EXPLANATION OF CHANGES Brownsfields Assessment Cooperative Agreement For the City of Tucson to inventory, characterize, assess, and conduct cleanup planning and community involvement related activities for Brownfields sites. The grantee plans to conduct approximately 42 Phase I Assessments and 8 Phase II Assessments. The project will build help with assessments related to property acquisition for the Downtown Links Project Area and to conduct assessment on properties along the Modern Streetcar route, where renewed interest of development has increased redevelopment. This amendment extends the project end date from 9/30/2017 to 9/30/2018. There is no change to the federal funding amount of \$400,000.						
BUDGET PERIOD 10/01/2014 - 09/30/2018		PROJECT PERIOD 10/01/2014 - 09/30/2018		TOTAL BUDGET PERIOD COST \$400,000.00		
				TOTAL PROJECT PERIOD COST \$400,000.00		
NOTICE OF AWARD						
Based on your Application dated 06/08/2017 including all modifications and amendments, the United States acting by and through the US Environmental Protection Agency (EPA) hereby awards \$0. EPA agrees to cost-share <u>100.00%</u> of all approved budget period costs incurred, up to and not exceeding total federal funding of \$400,000. Recipient's signature is not required on this agreement. The recipient demonstrates its commitment to carry out this award by either: 1) drawing down funds within 21 days after the EPA award or amendment mailing date; or 2) not filing a notice of disagreement with the award terms and conditions within 21 days after the EPA award or amendment mailing date. If the recipient disagrees with the terms and conditions specified in this award, the authorized representative of the recipient must furnish a notice of disagreement to the EPA Award Official within 21 days after the EPA award or amendment mailing date. In case of disagreement, and until the disagreement is resolved, the recipient should not draw down on the funds provided by this award/amendment, and any costs incurred by the recipient are at its own risk. This agreement is subject to applicable EPA regulatory and statutory provisions, all terms and conditions of this agreement and any attachments.						
ISSUING OFFICE (GRANTS MANAGEMENT OFFICE)			AWARD APPROVAL OFFICE			
ORGANIZATION / ADDRESS			ORGANIZATION / ADDRESS			
U.S. EPA, Region 9 Grants Management Section, EMD 6-1 75 Hawthorne Street San Francisco, CA 94105			U.S. EPA, Region 9 Superfund Division 75 Hawthorne Street San Francisco, CA 94105			
THE UNITED STATES OF AMERICA BY THE U.S. ENVIRONMENTAL PROTECTION AGENCY						
Digital signature applied by EPA Award Official for Craig A. Wills - Grants Management Officer Maria Roverso - Award Official delegate					DATE 06/22/2017	

EPA Funding Information

BF - 99T19401 - 1 Page 2

FUNDS	FORMER AWARD	THIS ACTION	AMENDED TOTAL
EPA Amount This Action	\$ 400,000	\$ 0	\$ 400,000
EPA In-Kind Amount	\$ 0	\$	\$ 0
Unexpended Prior Year Balance	\$ 0	\$	\$ 0
Other Federal Funds	\$ 0	\$	\$ 0
Recipient Contribution	\$ 0	\$	\$ 0
State Contribution	\$ 0	\$	\$ 0
Local Contribution	\$ 0	\$	\$ 0
Other Contribution	\$ 0	\$	\$ 0
Allowable Project Cost	\$ 400,000	\$ 0	\$ 400,000

Assistance Program (CFDA)	Statutory Authority	Regulatory Authority
66.818 - Brownfields Assessment and Cleanup Cooperative Agreements	CERCLA: Sec. 104(k)(2)	2 CFR 200 2 CFR 1500 and 40 CFR 33

[illegible]

Budget Summary Page

Table A - Object Class Category (Non-construction)	Total Approved Allowable Budget Period Cost
1. Personnel	\$0
2. Fringe Benefits	\$0
3. Travel	\$8,400
4. Equipment	\$0
5. Supplies	\$2,800
6. Contractual	\$388,800
7. Construction	\$0
8. Other	\$0
9. Total Direct Charges	\$400,000
10. Indirect Costs: % Base	\$0
11. Total (Share: Recipient <u>0.00</u> % Federal <u>100.00</u> %.)	\$400,000
12. Total Approved Assistance Amount	\$400,000
13. Program Income	\$0
14. Total EPA Amount Awarded This Action	\$0
15. Total EPA Amount Awarded To Date	\$400,000

Administrative Conditions

The recipient agrees to comply with the current EPA general terms and conditions available at:

<https://www.epa.gov/grants/epa-general-terms-and-conditions-effective-april-27-2017-or-later> These terms and conditions are in addition to the assurances and certifications made as a part of the award and the terms, conditions, or restrictions cited throughout the award. The EPA repository for the general terms and conditions by year can be found at: <https://www.epa.gov/grants/grant-terms-and-conditions>

All Administrative Terms and Conditions Remain the Same.

Programmatic Conditions

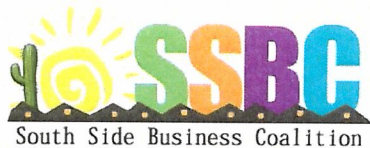
All Programmatic Terms and Conditions Remain the Same.

END OF DOCUMENT



ATTACHMENT E

LETTERS OF SUPPORT AND COMMITMENT



October 21, 2017

Carlos A. De La Torre, P.E.
Environmental & General Services Department
PO Box 27210
Tucson, Arizona 85726-7210

Re: Letter of Commitment for City of Tucson, Arizona
2018 Brownfields Community-Wide Assessment Grant

Dear Mr. De La Torre:

The South Side Business Coalition (SSBC) is pleased to provide this Letter of Commitment to the City of Tucson for its Community-Wide Assessment Grant application to the Environmental Protection Agency (EPA) for the Fiscal Year 2018. We are proud to be an organization of diverse, local entrepreneurs, located along Tucson's South Side 12th Avenue Corridor, La Doce – a significantly utilized transportation corridor within a predominantly Latino community. Here, you will find an eclectic array of businesses, from charming local eateries to *carnicerias* and beauty salons to tire shops, all mostly minority-owned.

The SSBC aims to identify the needs of our business community and help design strategies that achieve economic balance with our culture. Our vision is a new south side, bringing new visitors to sample the variety of products and services we offer, and share in the richness and beauty of our culture. We are excited that this funding can be used to address environmental impacts associated with inadequate public infrastructure and existing dilapidated commercial building stock to stimulate the revitalization of La Doce. We intend to work closely with the City of Tucson in their efforts to revitalize La Doce, and other targeted areas of the business community, by encouraging member participation and more local, minority entrepreneurship.

We are hopeful that the City of Tucson will submit a successful grant proposal. We thank you for the opportunity to show our support for this grant. Should you have any questions, please contact me at your convenience.

Sincerely,

Francisca Villegas

A handwritten signature in dark ink, consisting of a large, stylized 'F' followed by a series of loops and a long horizontal stroke extending to the right.

November 14, 2017

Attn: Carlos A. De La Torre, Director of Environmental & General Services Department

Re: Community-Wide Assessment Grant (South 12th Ave)

Dear Mr. De La Torre,

The Common Group is very much in support of the City of Tucson as a recipient of the Community-Wide Assessment Grant and would therefore like to offer this letter of commitment. As an organization that stems from the south side of Tucson, we understand the need as well as the economic impact that can stem from small businesses, land owners, stakeholders, etc. receiving this kind of support and assistance.

The Common Group is a small development company that for seven years has developed properties solely on the southwest side, or “south side”, of Tucson; one directly on 12th Ave and another just west of 12th Ave on Irvington Rd, among others. This is a thriving trade area with many small, family-owned business that cater to the community and culture that surrounds it; 12th Avenue being the primary north-south corridor of this area. We will continue to do what we can to help this area continue to grow and flourish and would love to see this grant used to help stimulate more growth and businesses. The economic impact of such would be wonderful. We commit to supporting the City of Tucson through using our resources for community outreach, business outreach and space for community meetings.


Thank you for your time and the opportunity to show our support. We are hopeful that 12th Ave will soon be benefiting from this grant.

Sincerely,

Guillermo Gallegos

Guillermo Gallegos



 Post Office Box 27210
Tucson, AZ 85726-7210
(520) 791-3109
FAX: (520) 622-7112

November 9, 2017

Mr. Carlos A. De La Torre, P.E., Director
City of Tucson, Environmental & General Services Department
PO Box 27210
Tucson, Arizona 85726-7210

Dear Mr. De La Torre,

Tucson Clean and Beautiful, Inc. offers its commitment to the City of Tucson in its effort to obtain the **Environmental Protection Agency Community Wide Brownfields Assessment Grant** to provide funding for environmental assessments, brownfields inventories, planning and community outreach.

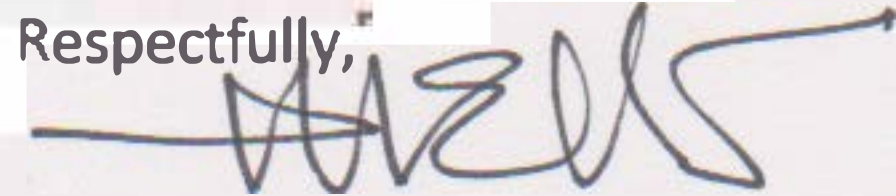
Tucson Clean and Beautiful, Inc. (TCB) was formed more than 30 years ago to preserve and improve Tucson's environment, conserve natural resources, and enhance the quality of life. We are the community platform for volunteer environmental engagement.

The TCB Board of Directors feels that this Brownfields project is consistent with its efforts to address environmental and deterioration issues in the City. The Board feels that the environmental assessments on properties throughout the City will ultimately help to improve the quality of life for Tucsonans by expediting the redevelopment of abandoned sites or underdeveloped sites.

TCB's success is derived from its ability to provide outreach into the community. We believe we can be crucial in assisting the City of Tucson in achieving the tasks for this Brownfields program by providing community outreach services. We can commit the 5 hours of staff time each month to help with public outreach activities for this grant program (i.e. email blasts, development of flyers, flyer distribution, etc.). The average salary of a TCB staff member is \$20 an hour and the in-kind contribution over the life of the grant would amount to \$3600.00 (5 hours a month x 12 = 60, 60 hours x 3 years = 180 hours, 180 hours x \$20 = \$3600.00)

Thank you for your consideration in this matter. Please feel free to contact me if you need any additional information.

Respectfully,

A handwritten signature in blue ink, appearing to read "Tom Ellis", is written over a white rectangular redaction box.

Tom Ellis
Executive Director



**Tucson
Urban League, Inc.**

Empowering Communities.
Changing Lives.

Deborah Embry
President and CEO

2305 S. Park Avenue
Tucson, AZ 85713

P 520 791-9522
F 520 623-9364

www.tucsonurbanleague.org

November 8, 2017

Carlos A. De La Torre, P.E.
Environmental & General Services Department
PO Box 27210
Tucson, Arizona 85726-7210

Re: Letter of Support for City of Tucson FY 2018 Brownfields Community-Wide Assessment Grant

Dear Mr. De La Torre:

The Tucson Urban League (TUL) strongly supports the City of Tucson's application for the Fiscal Year 2018 Environmental Protection Agency (EPA) Brownfields Community-Wide Assessment Grant application. The mission of TUL is to advance economic and social prosperity for African Americans, and other underserved Tucson area residents, by creating access to opportunity through advocacy, community partnerships, and programs and services. We work with opportunity youth and adults to attain economic self-sufficiency through good jobs, home ownership, entrepreneurship and wealth accumulation.

As a proud FY 2017 recipient of the Environmental Workforce Development and Job Training Grant (EWDJT), our job training program currently offers training for Construction, Contamination Remediation, Hazardous Materials Handling and more. This collaboration presents an opportunity that best exemplifies the intention of both grant programs. We will support the City of Tucson, and other partnering organizations, in their efforts to develop La Doce, by providing community outreach and working with local employer-partners to provide a trained workforce, many from the La Doce community, that can perform the work permitted under this grant.

We appreciate your consideration of our support for the City of Tucson and their submittal of this grant. Should you have any questions, please contact me at your convenience. Thank you.

Sincerely,

Deborah Embry
President and CEO



PRIMAVERA
FOUNDATION

PROVIDING
PATHWAYS
OUT OF POVERTY

151 W. 40TH STREET
TUCSON, AZ 85713
520-882-5383
WWW.PRIMAVERA.ORG

November 6, 2017

Carlos De La Torre
Director
General Services Department
PO Box 27210
Tucson, AZ 85726-7210
(520) 837-3783
Carlos.DeLaTorre@tucsonaz.gov

Dear Mr. De La Torre:

The Primavera Foundation strongly supports The City of Tucson, Pima County, and partnering organizations in their efforts to obtain an Environmental Protection Agency Brownfields Assessment Grant to conduct brownfields inventories, planning, environmental assessments, and community outreach; carry out cleanup activities at brownfield sites owned by the applicant; and/or provide loans that are used to clean up brownfields. We understand the redevelopment of brownfields sites would bring in additional businesses and services that will benefit residents and have positive effects community wide.

The mission of The Primavera Foundation is to provide pathways out of poverty through safe, affordable housing, workforce development, and neighborhood revitalization. Since 2007, Primavera has been carrying out neighborhood revitalization efforts in the City of South Tucson. The various activities have included owner-occupied rehab; the purchase, rehab, and sale of real estate owned (REO) units to first time homebuyers from our HomeOwnership Program pipeline; the purchase of distressed lots and development of new single family homes for sale; the creation and maintenance of community gardens; and the development of Las Abuelitas, a multifamily rental housing community, community building, and neighborhood park. A critical component of the Las Abuelitas project was environmental testing, which was funded through the City of South Tucson's Brownfields Assessment Grant.

In recent months, we have partnered with the City of South Tucson and their consultant to perform environmental testing on four formerly distressed lots that we own. This testing was also funded through the City of South Tucson's Brownfields Assessment Grant. As part of our neighborhood revitalization efforts in the City of South Tucson, the four sites are slated for development of single family home for first-time homebuyers. Should the Brownfields Assessment Grant be awarded, we hope to

provide workers to assist with environmental testing and clean-up through our temp and temp to hire social enterprise, Primavera Works.

We strongly support the City of Tucson and Pima County in their efforts to redevelop South 12th Avenue, and environmental assessment of brownfields is a vital component of these efforts. Through partnerships and collaboration, we believe that we can create change and build a better community. Please feel free to contact me at 520-308-3096 if you need any additional information. Thank you for your consideration in this matter.

Kind regards,

A handwritten signature in black ink that reads "Peggy Hutchison". The signature is written in a cursive, flowing style.

Peggy Hutchison
Chief Executive Officer



November 8, 2017

Carlos A. De La Torre, P.E.
Environmental & General Services Department
PO Box 27210
Tucson, Arizona 85726-7210

Re: Letter of Support for City of Tucson FY 2018 Brownfields Community-Wide Assessment Grant

Dear Mr. De La Torre,

The Healthy South Tucson Coalition (HST) strongly supports the City of Tucson's application for the Fiscal Year 2018 Environmental Protection Agency (EPA) Brownfields Community-Wide Assessment Grant application. HST is comprised of 33 service organizations within South Tucson, the City of Tucson and Pima County that originated from the Weed and Seed Program. The purpose of HST is to enhance the quality of life within the South Tucson community and its mission is to build capacity and engage community to inspire and empower South Tucson. HST creatively and practically addresses the health and well-being needs of South Tucson residents by:

- Creating an attractive, distinctive environment for people to live, stay, work, and play by building community and fostering engagement and progress
- Fostering partnerships to strengthen collaborations for optimum community impact
- Advocating for safe neighborhoods and seeking supports for "cradle to college/career" success
- Reinvesting in community & economic vitality

We believe through partnerships and collaboration we can create change and build a better community. HST supports the City of Tucson's submittal because it aligns with our goals and will directly assist us in our efforts to create a healthier community across all aspects. The La Doce Community is located just several blocks outside the City of South Tucson and serves as an extension of our community. Because we understand the barriers that plague our communities, and because we understand the economic development that can be realized from these assessments, we pledge to support the City of Tucson by providing community outreach and advocacy.

We support healthier community initiatives and believe the opportunities created by this grant program are necessary and vital in helping to move our community forward. Please feel free to contact me at 520-603-3439 if you need any additional information. Thank you for your consideration in this matter.

Regards,

Sincerely,

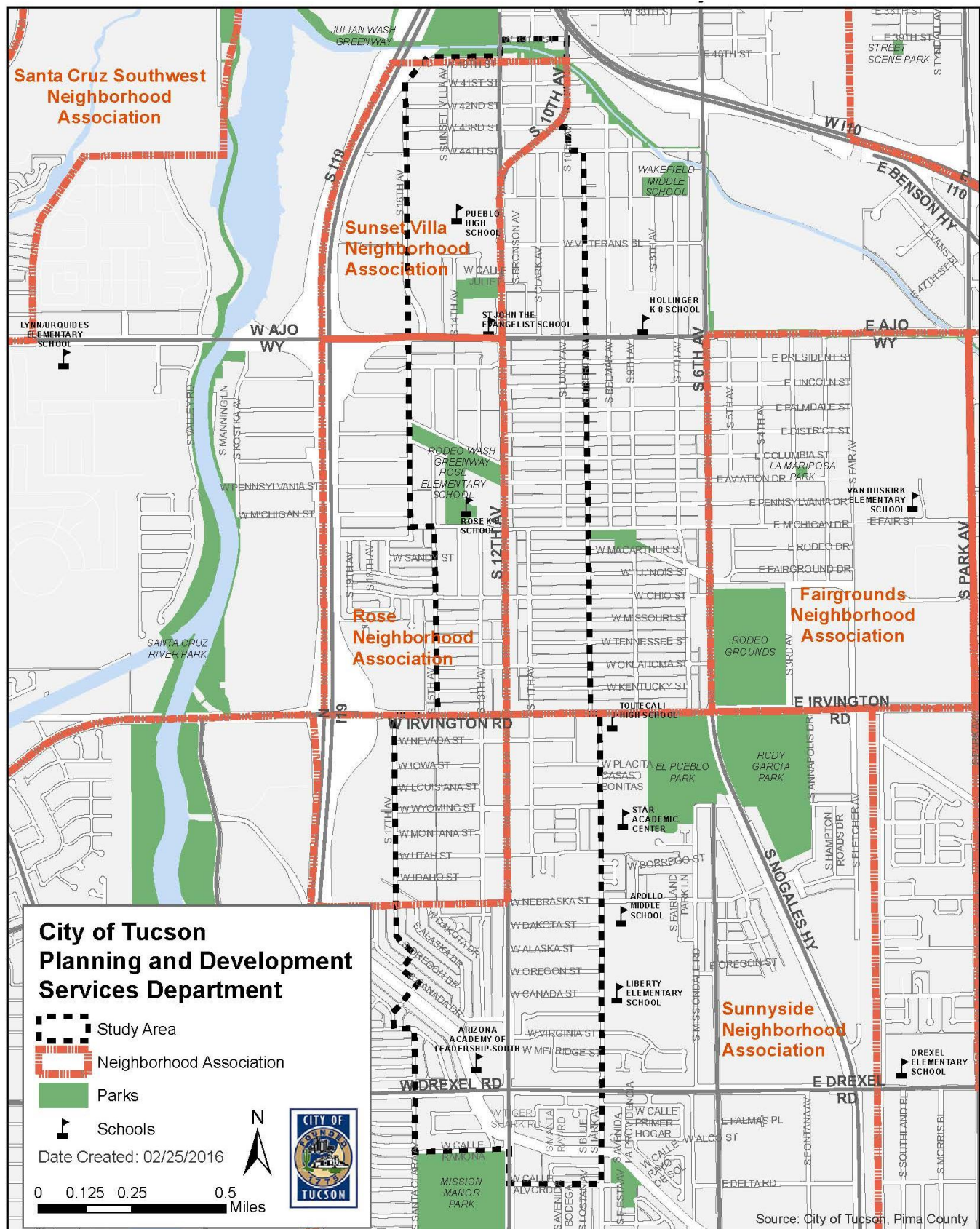
Lorenzo Gonzalez
President
Healthy South Tucson Coalition
lgonzalez@geotekusa.com

SF-424 Attachment to Section 16
Additional List of Program/Project Congressional Districts

AZ-003

AZ-002

Brownfields Project Focus Area – La Doce Cultural and Business Corridor



Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

11/15/2017

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

City of Tucson, Arizona

* b. Employer/Taxpayer Identification Number (EIN/TIN):

86-6000266

* c. Organizational DUNS:

0724508690000

d. Address:

* Street1:

PO Box 27210

Street2:

4004 South Park Avenue, Building 1

* City:

Tucson

County/Parish:

* State:

AZ: Arizona

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

85726-7210

e. Organizational Unit:

Department Name:

Environmental & Gen Services

Division Name:

Sust Prog, Eng & Tech Support

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mr.

* First Name:

Richard

Middle Name:

* Last Name:

Byrd

Suffix:

Title:

Environmental Manager

Organizational Affiliation:

* Telephone Number:

520-837-3710

Fax Number:

* Email:

richard.byrd@tucsonaz.gov

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-17-07

* Title:

FY18 GUIDELINES FOR BROWNFIELDS ASSESSMENT GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

2018 Brownfields Community-wide Assessment Grant, Hazardous Substances and Petroleum Products La Doce Cultural and Business District

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="300,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="300,000.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email: * Signature of Authorized Representative: * Date Signed: